

Kristen G. Simplicio (Bar No. 263291)  
Anna Haac (*pro hac vice*)  
**TYCKO & ZAVAREEI LLP**  
2000 Pennsylvania Avenue Northwest,  
Suite 1010  
Washington, District of Columbia 20006  
Telephone: (202) 919-5852  
Facsimile: (202) 973-0950  
*ksimplicio@tzlegal.com*  
*ahaac@tzlegal.com*

Sabita J. Soneji (Bar No. 224262)  
Cameron R. Partovi (Bar No. 319589)  
**TYCKO & ZAVAREEI LLP**  
1970 Broadway, Suite 1070  
Oakland, California 94612  
Telephone: (510) 254-6808  
Facsimile: (202) 973-0950  
*ssoneji@tzlegal.com*  
*cpartovi@tzlegal.com*

Annick M. Persinger (Bar No. 272996)  
**TYCKO & ZAVAREEI LLP**  
10880 Wilshire Blvd., Suite 1101  
Los Angeles, CA 90024  
Telephone: (213) 425-3657  
*apersinger@tzlegal.com*

Eric Rothschild (*pro hac vice*)  
**NATIONAL STUDENT LEGAL  
DEFENSE NETWORK**  
1701 Rhode Island Avenue Northwest  
Washington, District of Columbia 20036  
Telephone: (202) 734-7495  
*eric@defendstudents.org*

*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

IOLA FAVELL, SUE ZARNOWSKI,  
AND MARIAH CUMMINGS, *on behalf*  
*of themselves and all others similarly situated,*

Plaintiffs,

v.

UNIVERSITY OF SOUTHERN  
CALIFORNIA and 2U, INC.,

Defendant.

Case No. 2:23-cv-00846-SPG-MAR

**NOTICE OF LOS ANGELES  
COUNTY SUPERIOR COURT  
FILINGS**

1 Please take notice that on March 29, 2023, Plaintiffs Iola Favell, Sue Zarnowski,  
 2 and Mariah Cummings filed a second lawsuit in Los Angeles County Superior against  
 3 Defendants University of Southern California and 2U, Inc. The case number is  
 4 23STCV06899. Rule 3.300(b) of the California Rules of Court requires that notice be  
 5 provided to this Court. Copies of the notices submitted to LA County Superior Court  
 6 are attached hereto as **Exhibits A** and **B**.

7 The March 29 state court lawsuit was necessitated by the removal of this first  
 8 lawsuit to this Court by Defendant 2U. In their motions to dismiss here, Dkt. # 28, 30,  
 9 Defendants argued – and *Sonner v. Premier Nutrition Corp.*, 971 F.3d 834 (9th Cir. 2020),  
 10 appears to provide – that this Court lacks equitable jurisdiction over the equitable claims  
 11 originally asserted by Plaintiffs in this lawsuit. *See* Dkt. # 28, 30. Accordingly, on March  
 12 29, 2023, Plaintiffs filed an amended complaint with this Court, Dkt. # 32, asserting  
 13 only legal claims for CLRA damages, while dismissing the equitable causes of action.  
 14 Those equitable claims now appear in the March 29 action only.

15  
 16  
 17 Date: April 3, 2023

/s/Kristen G. Simplicio

Kristen G. Simplicio (Bar No. 263291)

Anna C. Haac (*pro hac vice*)

**TYCKO & ZAVAREEI LLP**

2000 Pennsylvania Avenue Northwest,  
 Suite 1010

Washington, District of Columbia 20006

Telephone: (202) 919-5852

Facsimile: (202) 973-0950

*ksimplicio@tzlegal.com*

*ahaac@tzlegal.com*

Annick M. Persinger (Bar No. 272996)

**TYCKO & ZAVAREEI LLP**

10880 Wilshire Blvd., Suite 1101

Los Angeles, CA 90024

Telephone: (213) 425-3657

*apersinger@tzlegal.com*

1  
2 Sabita J. Soneji (Bar No. 224262)  
3 Cameron R. Partovi (Bar No. 319589)  
4 **TYCKO & ZAVAREEI LLP**  
5 1970 Broadway, Suite 1070  
6 Oakland, California 94612  
7 Telephone: (510) 254-6808  
8 Facsimile: (202) 973-0950  
9 *ssoneji@tzlegal.com*  
10 *cpartovi@tzlegal.com*

11 Eric Rothschild (*pro hac vice*)  
12 **NATIONAL STUDENT LEGAL**  
13 **DEFENSE NETWORK**  
14 1701 Rhode Island Avenue Northwest  
15 Washington, District of Columbia 20036  
16 Telephone: (202) 734-7495  
17 *eric@defendstudents.org*

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
*Counsel for Plaintiffs*